

DOAR RIECK KALEY & MACK

ATTORNEYS AT LAW

JOHN DOAR (1921-2014)
WALTER MACK

OF COUNSEL
JOHN JACOB RIECK, JR.
JOHN F. KALEY
MICHAEL MINNEFOR

ASTOR BUILDING
7TH FLOOR
217 BROADWAY
NEW YORK, N.Y. 10007-2911

TELEPHONE: (212) 619-3730
FACSIMILE: (212) 962-5037
e-mail: firm@doarlaw.com
website: www.doarlaw.com

August 31, 2022

**APPLICATION GRANTED
SO ORDERED** 
**VERNON S. BRODERICK
U.S.D.J. 09/07/22**

Via ECF Filing
Hon. Vincent S. Broderick
United States District Judge
500 Pearl Street
New York, New York 10007

Re: *United States v. Maria Lopez*
20 Cr. 493 (VSB)

Dear Judge Broderick:

I represent Maria Lopez in the above-referenced matter. At her presentment, Ms. Lopez was released on bail consisting principally of a \$200,000 PRB co-signed by 3 financially responsible persons, surrender of travel documents and with travel limited to the EDNY, SDNY, Middle District of Florida (where she presently resides) and points in between for transit only. Ms. Lopez has been in full compliance with the conditions of her release. By Order dated April 21, 2021, the Court modified Ms. Lopez's travel limits to include the Middle District of Pennsylvania to accommodate Ms. Lopez's need for delicate surgery by a surgeon whom she had located in that area and who was willing to perform the surgery. Ms. Lopez and her family then moved to Pennsylvania, where Ms. Lopez had the surgery and rehabilitated. During the period of her rehabilitation in Pennsylvania, Ms. Lopez found employment which she was able to do remotely for the most part. When Ms. Lopez concluded a period of rehabilitation, with the Court's permission, Ms. Lopez and her family moved back to Orlando, Florida. Her employment continued with the same company even after her move back to Orlando.

I write now to request that Ms. Lopez be permitted to travel from her home in Orlando to Pennsylvania to participate in a training program sponsored by her employer. Ms. Lopez proposes to fly from her home in Orlando to Philadelphia on September 19, 2022, returning to her home in Orlando on September 21, 2022. Prior to departing, Ms. Lopez will advise her Pretrial Services officer of her lodging accommodations while in Pennsylvania along with the details of her flight arrangements. Both the Government and Pretrial Services consent to this request.

Hon. Vincent S. Broderick

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August 31, 2022

Thank you for the Court's consideration of the foregoing.

Respectfully submitted,

/s/

John F. Kaley

cc: AUSA Nicholas Chiuchiolo
Pretrial Services Ebonie Henderson
(both via email)